

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)	CRIMINAL NO. 05-888 (FLW)
)	
v.)	
)	
MATTHEW THOMPkins,)	18 U.S.C. §§ 2423(e) and 1956(h)
a/k/a "Seymore Benjamin,")	18 U.S.C. §§ 982 and 2253
a/k/a "Craig Williams,")	
a/k/a "Brandon Williams")	
a/k/a "Knowledge")	
_____)	

SUPERSEDING INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1
(Conspiracy to Transport Minors to Engage in Prostitution)

1. From in or about January 1999 to in or about December 2005, in the District of New Jersey, and elsewhere, the defendant,

MATTHEW D. THOMPkins,
a/k/a "Seymore Benjamin,"
a/k/a "Craig Williams,"
a/k/a "Brandon Williams"
a/k/a "Knowledge,"

did knowingly conspire and agree with co-conspirators Demetrius Lemus, Noel Lopez, Melissa Ramlakhan, Emily Collins-Koslosky, Jacqueline Collins-Koslosky, Kemyra Jemerson and with others to transport individuals who had not attained the age of 18 years in interstate commerce with the intent that the individuals engage in prostitution, contrary to Title 18, United States Code, Section 2423(a).

Object of the Conspiracy

2. It was the object of the conspiracy to recruit and transport minor girls and others between various cities, including Atlantic City, New Jersey, Bronx, New York and Las Vegas, Nevada, to engage in prostitution for the financial benefit of defendant **Matthew Thompkins** and his co-conspirators.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that defendant **Matthew Thompkins** and his co-conspirators managed a large-scale prostitution ring that operated in several states including, but not limited to, New Jersey, New York, Nevada, Pennsylvania, Florida, Massachusetts and the District of Columbia.

4. It was further part of the conspiracy that defendant **Matthew Thompkins** and his co-conspirators recruited and transported minor girls between several states for the purpose of engaging in prostitution.

5. As a result of their actions in furtherance of the conspiracy, defendant **Matthew Thompkins** and his co-conspirators derived substantial income from the prostitution of minor girls and others.

Overt Acts

In furtherance of the conspiracy, and to effect its unlawful object, defendant **Matthew Thompkins** and his co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

6. In or about December 2003, defendant **Matthew Thompkins** caused a minor girl, referred to herein as Minor Girl 1, to travel from Atlantic County, New Jersey to Las Vegas, Nevada to work as a prostitute.

7. On or about July 1, 2005, co-conspirator Kemyra Jemerson caused a minor girl,

hereinafter referred to as Minor Girl 2, to travel from Las Vegas, Nevada to New York to work as a prostitute for defendant **Matthew Thompkins**.

8. On or about July 2, 2005, Minor Girl 2 met with defendant **Matthew Thompkins** in New York, where he bought her clothes to wear while working as a prostitute.

9. On or about July 5, 2005, Minor Girl 2 traveled from New York to New Jersey with co-conspirators Emily Collins-Koslosky and Anna Argyroudis to work as a prostitute for defendant **Matthew Thompkins**.

In violation of Title 18, United States Code, Section 2423(e).

COUNT 2
(Conspiracy to Engage in Money Laundering)

1. Paragraphs 2 through 5 of Count 1 are incorporated by reference and realleged as if fully set forth herein.

2. From in or about January 1999 to in or about December 2005, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

MATTHEW THOMPkins,
a/k/a “Seymore Benjamin,”
a/k/a “Craig Williams,”
a/k/a “Brandon Williams”
a/k/a “Knowledge,”

and others, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, and (1) with the intent to promote the carrying on of specified unlawful activity, namely, conspiracy to transport individuals and minors in furtherance of prostitution, contrary to Title 18, United States Code, Sections 2421 and 2423, and (2) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, did knowingly and willfully conspire and agree with co-conspirators Melissa Ramlakhan, Jacqueline Collins-Koslosky, Anna Argyroudis, and Kemyra Jemerson and others to conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of such specified unlawful activity, contrary to Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (a)(1)(B)(i).

In violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

Upon conviction of the offenses alleged in Count 1 and Count 2 of this Superseding Information, defendant **MATTHEW THOMPkins**, a/k/a “Seymore Benjamin,” a/k/a “Craig Williams,” a/k/a “Brandon Williams,” a/k/a “Knowledge,” shall forfeit to the United States pursuant to 18 U.S.C. §§ 982(a)(1) and 2253(a)(2) and (a)(3), any property constituting and traceable to gross profits and other proceeds obtained from said violations, and any property used and intended to be used to commit and to promote the commission of said violations, including but not limited to the following:

A. *Money Judgment*: A sum of money, equal to the amount of \$748,243 in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Count 1 and Count 2 of this Superseding Information;

B. *Real Property*: All that lot and parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements located at and more particularly described as follows:

- (1) New York: 3530 Holland Avenue, Bronx, New York 10467-6020;
- (2) New York: 16 Tall Tulip Lane, Yonkers, New York; 10710-2326
- (3) New York: 909 East 169 Street, Bronx, New York; 10459-1083
- (4) New York: 508 Central Park Avenue, Unit 5102, Scarsdale, NY
10583;
- (5) New Jersey: 719 2nd Avenue, Galloway Township, New Jersey
08205;

C. *Conveyance*: All motor vehicles as more particularly described as follows:

- (1) 2003 GMC Hummer H2, VIN# 5GRGN23U13H100543;
- (2) 2003 Mercedes Benz SL500, VIN# WDBSK75FX3F017851;

- (3) 2003 Land Rover RRV, VIN# SALMB11423A105441;
- (4) 2002 BMW 745, VIN# WBAGL63452DP50977;
- (5) 2002 Cadillac Escalade, VIN# 1GYEK63N52R205221;
- (6) 2000 Mercedes Benz 500, VIN# WDBPJ75J4YA007429;
- (7) 1999 Lexus RX300, VIN# JT6HF10UXX0031980;
- (8) 1997 Ford Expedition, VIN# 1FMFU18L9VLA74795;

D. *Bank Accounts*: All United States currency funds or other monetary instruments credited to either account number 0000873715 in the name of defendant MATTHEW THOMPCKINS and co-conspirator and MELISSA RAMLAKHAN located at the Municipal Credit Union, 2 Lafayette Street, New York, New York or credited to the following account numbers in the following names, located at JP Chase Bank, 1 Chase Manhattan Plaza, New York, New York:

ACCOUNT	ACCOUNT NUMBER	ACCOUNT HOLDER
Money Market	019202312665	MATTHEW D. THOMPCKINS
Savings	091-0903300-01	MATTHEW D. THOMPCKINS
Checking	091-0903300-65	MATTHEW D. THOMPCKINS and MELISSA RAMLAKHAN

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty;

then it is the intent of the United States of America to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above, pursuant to Title 18, United States Code, Section 2253(o) and Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b).

In violation of Title 18, United States Code, Sections 982(a)(1) and 2253(a)(2) and (a)(3).

CHRISTOPHER J. CHRISTIE
United States Attorney